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,	
8	UNITED ST

### STATES DISTRICT COURT

### FOR THE DISTRICT OF NEVADA

EVA PEPAJ, LUCY PINDER, RACHEL BERNSTEIN a/k/a RACHEL KOREN, and TIFFANY TOTH GRAY

Case No. 2:19-cv-01088-JAD-BNW

### Plaintiffs,

VS.

GRANITE GAMING GROUP II, LLC d/b/a GIRLS OF GLITTER GULCH

## STIPULATION AND ORDER TO EXTEND DEFENDANT'S DEADLINE TO RESPOND TO COMPLAINT

[FOURTH REQUEST]

Defendant.

Plaintiffs, Eva Pepaj, Lucy Pinder, Rachel Bernstein a/k/a Rachel Koren, and Tiffany Toth Gray (collectively "Plaintiffs"), by and through their counsel, Alverson Taylor & Sanders, and Defendant, Granite Gaming Group II, LLC d/b/a Girls of Glitter Gulch ("Defendant"), by and through its counsel, Lewis Roca Rothgerber Christie LLP, hereby stipulate and agree that the deadline for Defendant to respond to Plaintiff's Complaint should be extended to January 10, 2020.

The Parties are currently engaged in ongoing settlement discussions and are actively trying to find a resolution to this matter that all Parties find acceptable. Based on representations of Defendant's counsel, Defendant is a holding company without any assets. The Parties are 6605 GRAND MONTECITO PARKWAY 13 SUITE 200 LAS VEGAS, NEVADA 89149 (702) 384-7000 14 15 16 17 18 19 20 21

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currently investigating whether there is insurance that may cover the allegations in Plaintiffs' Complaint and what may be necessary for the Parties to do for that insurance to be implicated in this matter.

Because Defendant has represented that it has no assets, the Parties have agreed to this additional extension of the deadline for Defendant to respond to the Complaint to allow the Parties to attempt to reach a solution that works for everyone involved without requiring Defendant's counsel to expend the time and resources responding to the Complaint when that time and those resources could be used instead to work toward resolving this matter and determining whether there is insurance coverage that will allow Plaintiff's to pursue their claims.

The Parties agree that giving Defendant until January 10, 2020 should provide the Parties with adequate time to determine if there is a tenable solution that will be agreeable to Plaintiffs and Defendant. The Parties are aware that this is a fourth request and that the amount of time requested is not insignificant; however, the Parties feel that there is good cause for this extension given the facts of this case and the progress of their negotiations thus far. Additionally, the Parties affirm that this extension is sought in good faith.

### IT IS SO STIPULATED.

Attorneys for Plaintiffs

Dated: November 21, 2019	Dated: November 21, 2019
ALVERSON TAYLOR & SANDERS	LEWIS ROCA ROTHGERBER CHRISTIE LLP

By: /s/ John F Bragonia

By: /s/ David M. Sexton	By: <u>/s/ John E. Bragonje</u>
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Las Vegas, Nevada 89149	Attorneys for Defendant

# ALVERSON TAYLOR & SANDERS

# LAWYERS 6605 GRAND MONTECITO PARKWAY SUITE 200 LAS VEGAS, NEVADA 89149 (702) 384-7000

# **ORDER**

# IT IS SO ORDERED.

The deadline for Defendant to respond to Plaintiff's Complaint shall be extended and Defendant shall have until January 10, 2020 to file a response to Plaintiff's Complaint.

DATED December 2, 2019

